

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63<sup>RD</sup> FLOOR  
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040  
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212-763-0883

DIRECT EMAIL shecker@kaplanhecker.com

August 26, 2022

## VIA ECF

The Honorable Sarah Netburn  
United States Magistrate Judge  
40 Foley Square, Room 430  
New York, NY 10007

Re: *Roche Freedman LLP v. Jason Cyrulnik*, No. 1:21-cv-1746 (JGK)(SN)

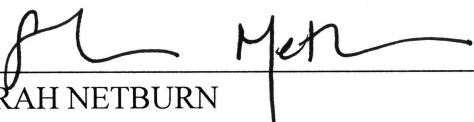
Dear Judge Netburn:

We write on behalf of the parties in this litigation and pursuant to the Court's August 19, 2022, order to "provide a proposed schedule for the Court's endorsement by no later than August 26, 2022."

The parties have agreed on the schedule below. Note that although the dates of certain third-party depositions have been agreed to between the parties, certain of those third parties have not yet confirmed their availability (marked with an asterisk). If the Court approves this schedule, the parties will modify and/or serve those third parties with subpoenas on dates consistent with the proposed schedule (but work to complete the depositions on reasonably convenient dates).

We have placed the proposed schedule on the next page for convenience.

**SO ORDERED.**

  
\_\_\_\_\_  
SARAH NETBURN  
United States Magistrate Judge

August 29, 2022  
New York, New York

KAPLAN HECKER &amp; FINK LLP

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<b>Proposed Depositions Schedule</b>	
<b>Date</b>	<b>Witness</b>
<b>8/31</b>	
<b>9/2</b>	William Tracy (3:00pm by Zoom)
<b>9/6</b>	
<b>9/7</b>	
<b>9/8</b>	
<b>9/9</b>	Cyrulnik Fattaruso LLP (afternoon)
<b>9/12</b>	Amos Friedland (9:00am)
<b>9/13</b>	Edward Normand (9:00am)
<b>9/14</b>	Vel Freedman (9:00am)
<b>9/15</b>	Patterson Belknap (9:00am) Kyle Roche (immediately thereafter)
<b>9/16</b>	Jordana Haviv (am) Richard Cipolla (pm)
<b>9/19</b>	Holcomb (9:00am)
<b>9/20</b>	Jason Cyrulnik (9:00am)
<b>9/21</b>	Katherine Eskovitz (by Zoom)*
<b>9/22</b>	
<b>9/23</b>	
<b>9/28</b>	Alex Potter (am) Kelvin Goode (pm)
<b>9/29</b>	Daniel Stone
<b>9/30</b>	Start Up
<b>10/3</b>	Paul Fattaruso*
<b>10/6</b>	Derek Rundell*
<b>10/7</b>	
<b>10/12</b>	Jeroen Van Kwawegen* Mark Richardson*
<b>10/13</b>	
<b>10/14</b>	

Respectfully,



Sean Hecker

cc: Counsel of Record (via ECF)